

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) XOUCHI JONATHAN THAO,	)	
Special Administrator For The	)	
Estate of KONGCHI JUSTIN THAO,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-19-1175-JD
	)	JURY TRIAL DEMANDED
(2) GRADY COUNTY CRIMINAL	)	
JUSTICE AUTHORITY, <i>et al.</i>	)	
	)	
Defendants	)	

**DEFENDANT GRADY COUNTY  
CRIMINAL JUSTICE AUTHORITY'S WITNESS LIST**

Defendant Grady County Criminal Justice Authority (“Defendant Authority”), by and through their counsel of record, W.R. Moon Jr., submits the following Witness List pursuant to this Court’s Amended Scheduling Order (Dkt. 58):

**WITNESS LIST**

<b>Witnesses Defendant Authority Expects to Call</b>		
<b>No</b>	<b>Name and Address</b>	<b>Proposed Testimony</b>
1.	Jim Gerlach, Defendant c/o Andy A. Artus & W.R. Moon Jr. Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	Will testify regarding his knowledge of the policies and procedures at the GCCJA. Will testify regarding his knowledge of the training and supervision of GCCJA staff. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint. May authenticate various GCCJA and GCLEC documents.
2.	Lt. Johnnie Drewery c/o Andy A. Artus & W.R. Moon Jr. Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street	Will be able to testify regarding his investigation of the incidents at issue. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his

	Second Floor Oklahoma City, OK 73105 (405) 524-2070	Complaint. May authenticate various GCCJA and GCLEC documents.
3.	Trevor Henneman, Defendant c/o Jessica L. Dark Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Oklahoma City, OK 73106 (405) 235-1611	Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
4.	Johnny Farley c/o Andy A. Artus & W.R. Moon Jr. Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	Deposed. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
5.	Jimmy Duncan c/o Andy A. Artus & W.R. Moon Jr. Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	Deposed. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
6.	Charity Gray Alexandra G. Ah Loy, General Counsel c/o Turn Key Health Clinics, LLC 19 NE 50 <sup>th</sup> Street Oklahoma City, OK 73105	Will be able to testify to her knowledge of the events as alleged by Plaintiff in his Complaint. May authenticate various GCCJA, Turn Key Health, and GCLEC documents.
7.	Christopher Harrison 1181 County Road 1350 Chickasha, OK 73018 (405)933-9097	Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
8.	Hanna Stiff 807 W. Kanas Ave. Chickasha, OK 73018 (405)320-3039	Will be able to testify to her knowledge of the events as alleged by Plaintiff in his Complaint.

9.	Kyle Ellis 518 N. 9th Chickasha, OK 73018 (405)779-3847	Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
10.	Dr. Richard M. Hough 3101 Browns Mill Road Suite 6-244 Johnson City, TN 37604 (850)393-5389	Expert Witness. Will testify regarding his education, training and experience. Will testify regarding policies and practices of GCLEC, GCLEC operations, and all aspects of his report. Will authenticate his report.
11.	Dr. Jeff Reames, M.D. Mercy Health Center Emergency Department 4300 W. Memorial Road Oklahoma City, Oklahoma 405-752-3030	Expert Witness. Will testify regarding his education, training and experience. Will testify pursuant to his expert report. Will authenticate his report.
12.	Dr. Mark Kroll, PhD Box 23 Crystal Bay, MN 55323 (805)428-1838	Expert Witness. Will testify regarding his education, training and experience. Will testify pursuant to his expert report. Will authenticate his report.

<b>Witnesses Defendant Authority May Call</b>		
13.	John Baker c/o Andy A. Artus & W.R. Moon Jr. Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	May testify regarding his status as a GCCJA Trust Board member during the events at issue. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint. May authenticate various GCCJA documents.
14.	Ralph Beard c/o Andy A. Artus & W.R. Moon Jr. Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	May testify regarding his status as a GCCJA Trust Board member during the events at issue. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint. May authenticate various GCCJA documents.
15.	Jamie Meyer c/o Andy A. Artus & W.R. Moon Jr.	May testify regarding his status as a GCCJA Trust Board member during the events at issue. Will be able to testify to

	Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	his knowledge of the events as alleged by Plaintiff in his Complaint. May authenticate various GCCJA documents.
16.	Jack Weaver c/o Andy A. Artus & W.R. Moon Jr.  Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	May testify regarding his status as a GCCJA Trust Board member during the events at issue. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint. May authenticate various GCCJA documents.
17.	Jim Weir c/o Andy A. Artus & W.R. Moon Jr.  Collins, Zorn & Wagner, P.C. 429 N.E. 50th Street Second Floor Oklahoma City, OK 73105 (405) 524-2070	May testify regarding his status as a GCCJA Trust Board member during the events at issue. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
18.	Rebecca Brown 1715 Opal Chickasha, OK 73018 (405)881-8055	Will be able to testify to her knowledge of the events as alleged by Plaintiff in his Complaint.
19.	Lynn Williams 6600 N Harvey Pl., Oklahoma City, OK 73116 (405)848-6724	Will be able to testify regarding his investigation of the incidents at issue. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
20.	Kendall Myers 117 N 4th Street Chickasha, OK 73018 (405)222-6020	Chickasha Fire and EMS Paramedic. Will be able to testify to her knowledge of the events as alleged by Plaintiff in his Complaint
21.	John Seyler 117 N 4th Street Chickasha, OK 73018 (405)222-6020	Chickasha Fire and EMS Paramedic. Will be able to testify to his knowledge of the events as alleged by Plaintiff in his Complaint.
22.	Omar Ampie 200 NW 4th St, Oklahoma City, OK 73102 (405) 231-4206	U.S. Marshal. Will be able to testify to observations of decedent, family and interactions with family of decedent. May be able to testify regarding policies and

		procedures for housing and transport of federal transfer center inmates.
23.	Any necessary records custodian including, but not limited to, records custodians from the GCCJA, GCLEC, Office of the Chief Medical Examiner, St. Agnes Medical Center, Integris Baptist Medical Center, Grady County Memorial Hospital, U.S. Marshal's Service, Council on Law Enforcement Education and Training (CLEET) and others as necessary pursuant to Defendant Authority's Final Exhibit List.	To authenticate documents.
24.	Any necessary rebuttal witness and/or rebuttal expert witness	
25.	Any witnesses listed by Plaintiff or Co-Defendants not objected to by these Defendants at pre-trial or trial	
26.	Any relevant witnesses identified during discovery.	

Respectfully submitted,

s/W.R. Moon Jr.

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ATTORNEY FOR DEFENDANTS  
GRADY COUNTY CRIMINAL  
JUSTICE AUTHORITY

**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2023, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants. Also, I have mailed through the U.S. Postal system prepaid the above document to:

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s/W.R. Moon, Jr.  
W.R. Moon, Jr.